

Remarks

The present application contains claims 86-87 and 100, as well as rejoined claims 206-225.

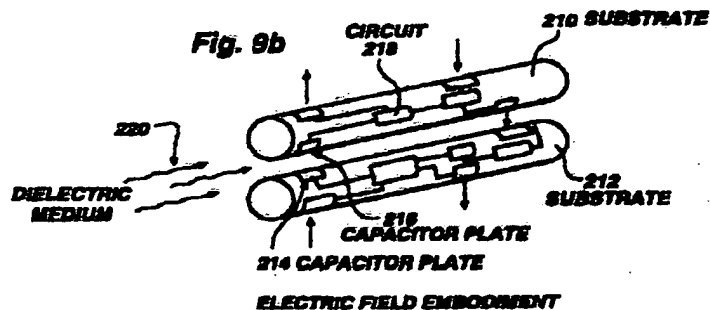
Applicants' undersigned attorney thanks Examiner Duong for courtesies extended during a recent telephone discussion. During that brief discussion, applicants' attorney explained applicants' position: that, in the 2/18/04 Official Action, applicants should have at least been given the choice to elect claims 206-225, since they were added in connection with a Request for Continued Examination. Appreciating applicants' position, Examiner Duong indicated that a request for rejoinder of claims 206-225 would be favorably considered. Accordingly, applicants hereby respectfully request that claims 206-225 be rejoined for prosecution in this application.

In the 2/18/04 Official Action, the Examiner rejected claims 86-87 and 100 as anticipated by U.S. No. 5,673,131 ("Jacobsen"). In response, applicants have amended claim 86 to clearly recite that the half-capacitors used for capacitive coupling are located on the chips.

Applicants have also stricken from claims 86 and 100 various planarity limitations that are not necessary to distinguish these claims from Jacobsen. Finally, applicants have amended claim 86 to rectify a minor antecedence problem recognized by applicants' attorney.

Unlike amended claims 86-87 and 100, the Jacobsen patent does not teach or suggest capacitive coupling between half-capacitors located on the chips. Rather, Jacobsen's only disclosure of half-capacitors clearly states that they are to be located on the substrate,

and separate from the chips. See Jacobsen referring to his Figure 9b at 7:13-16 ("In the



case of capacitive electrical field coupling, element 214 on the substrate 212 could simply be a capacitor plate, as would element 216 on substrate 210.").

Therefore, by reciting "a plurality of half-capacitors on a first semiconductor chip" and "a plurality of half-capacitors on a second semiconductor chip," amended claims 86-87 clearly distinguish over Jacobsen. Claim 100 recites "first and second chips, each said chip having a plurality of half-capacitors," and thus similarly distinguishes over Jacobsen.

WHEREFORE, in light of these amendments and remarks,
applicants respectfully request allowance of claims 86-87, 100,
and 206-225.

Respectfully submitted,

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